

INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL UNION NO. 150, 150B, 150A, 150C, 150RA, 150D, 150G, 150M

AFFILIATED WITH THE A.F.L.-C.I.O.

6140 JOLIET ROAD
COUNTRYSIDE, IL 60525708-579-6663
FAX 708-588-1647DALE D. PIERSON
ELIZABETH A. LAROSE
MELINDA S. HENSEL
ROBERT E. ENTIN
BRYAN P. DIEMER

LEGAL DEPARTMENT

CHARLES R. KISER
MARC R. POULOS
ROBERT G. REITER, JR.
MELISSA L. BINETTI
LAUREN S. SHAPIRO
KARL E. MASTERS

August 1, 2008

VIA FAX AND U.S. MAIL

Mr. Robert T. Hanlon
 Robert T. Hanlon & Associates, P.C.
 14212 Washington Street
 Suite 200
 Woodstock, Illinois 60098

Re: Barker, et al. v. Local 150
 No. 08 C 50015

Dear Mr. Hanlon:

In accordance with Judge Mahoney's request of July 23, 2008, and in response to your letter of July 25, 2008, the following individuals are currently available for depositions as listed below. Please keep in mind, however, that those who want to retain their own counsel will have additional scheduling problems to consider.

Charles August

Available:

September 11, 2008
September 23, 2008

Pursuant to correspondence dated July 24, 2008 from Gummerson & Rausch, it is my understanding that Mr. Charles August and his counsel are available September 11th or September 23, 2008 as of the date of that letter.

Nicholas Cline

Available any date after August 18, 2008, upon two (2) weeks notice.

Please be advised that Mr. Cline is not employed by Local 150 and makes his living in Indiana. It is therefore likely that you will need to compensate him for any lost wages if you plan to depose him outside the 100 mile limits of the Northern District of Illinois.

Joe Farrell

Available any date except: August 6, 2008 (a.m.)
 August 18, 2008 (a.m.)
 August 19, 2008



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Ryan Drew	Available any date after:	August 18, 2008
Mike Aprile	Available any date after:	August 12, 2008
Stanley Simrayh	Available any date after:	August 12, 2008
Carl McCaffrey	Available any date after:	August 12, 2008
Robert Klotz	Available:	August 19, 2008 September 3, 2008 September 4, 2008 September 10, 2008 September 11, 2008

Please be advised that Mr. Klotz is employed by the Midwest Operating Engineers Fringe Benefit Funds. Any deposition of him must be coordinated with MOE Fund counsel, Stephen J. Rosenblat, of the law firm of Baum, Sigman, Auerbach & Neuman, Ltd. Reach him at (312) 236-4316.

Please provide me with mutually agreeable dates for these depositions at your earliest convenience so that I may continue to facilitate same. If necessary, we can arrange for you to utilize the Local 150 Union Hall in Countryside for these depositions.

Very truly yours,

IUOE, LOCAL 150, AFL-CIO
LEGAL DEPARTMENT

Dale D. Pierson
General Counsel



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cc: James Sweeney
Charles August
Nicholas Cline
Joe Farrell
Ryan Drew
Mike Aprile
Stanley Simrayh
Carl McCaffrey
Robert Klotz
Stephen J. Rosenblat, Esq.